

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
AKEEM BADA	:	
a/k/a "AK,"	:	S8 20 Cr. 3 (KPF)
Defendant.	:	
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WHEREAS, on or about January 8, 2025, AKEEM BADA (the "Defendant"), was charged in an three-count Superseding Indictment, S8 20 Cr. 3 (KPF) (the "Indictment"), with conspiracy to commit bank fraud and wire fraud, in violation of Title 18 United States Code, Section 1349 (Count One); conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h) (Count Two); and aggravated identity theft, in violation of Title 18, United States Code, Sections 1028A(a)(1) and (b), and 2 (Count Three);

WHEREAS, the Indictment included a forfeiture allegation as to Count One of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A) of any and all property constituting, or derived from, proceeds the Defendant obtained directly or indirectly, as a result of the commission of the offense charged in Count One of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Indictment;

WHEREAS, on or about April 24, 2025, the Defendant pled guilty to Count One of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Indictment and agreed to forfeit

to the United States \$832,716 in United States currency, representing proceeds traceable to commission of the offense charged in Count One of the Indictment (the “Money Judgment”);

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$832,716 in United States currency representing the amount of proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained, (i) \$318,715 of which the Defendant is jointly and severally liable with co-defendants Farouk Kukoyi, Joshua Hicks, and Anthony Lee Nelson and the forfeiture money judgments entered against them in this case; (ii) \$318,715 of which the Defendant is jointly and severally liable with co-defendant Baldwin Osuji to the extent a forfeiture money judgment is entered against him in this case; and (iii) \$157,503 of which the Defendant is jointly and severally liable with co-defendants Farouk Kukoyi and Jimoh Aderomileh and the forfeiture money judgments entered against them in this case; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney United States Attorney Jay Clayton, Assistant United States Attorneys Alexander Li and Thomas Burnett, of counsel, and the Defendant and his counsel, Florian Miedel, Esq., that:

1. As a result of the offense charged in Count One of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$832,716 in United States currency (the “Money Judgment”), representing the amount of proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained, (i) \$318,715 of which the

Defendant is jointly and severally liable with co-defendants Farouk Kukoyi, Joshua Hicks, and Anthony Lee Nelson and the forfeiture money judgments entered against them in this case; (ii) \$318,715 of which the Defendant is jointly and severally liable with co-defendant Baldwin Osuji to the extent a forfeiture money judgment is entered against him in this case; and (iii) \$157,503 of which the Defendant is jointly and severally liable with co-defendants Farouk Kukoyi and Jimoh Aderomileh and the forfeiture money judgments entered against them in this case, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant AKEEM BADA, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Department of Treasury, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38th Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

4. The United States Department of Treasury or its designee shall be authorized to deposit the payment on the Money Judgment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

JAY CLAYTON
United States Attorney for the
Southern District of New York

By:



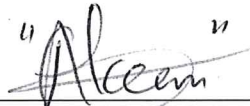
ALEXANDER LI
THOMAS BURNETT
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26 Federal Plaza
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(212) 637-2265/-1064

4/24/25

DATE

AKEEM BADA

By:



AKEEM BADA

4/24/25

DATE

By:



FLORIAN MIEDEL, ESQ.
Attorney for Defendant
52 Duane Street, 7th Floor
New York, NY 10007

4/24/25

DATE

SO ORDERED:



HONORABLE KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE

4/24/2025

DATE